

MODERN SLAVERY STATEMENT

1. INTRODUCTION

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and covers the activities of Western Suburbs (N'cle) Leagues Club Ltd ABN 24 000 973 919 (**Wests**) and our controlled entities to assess and address the risk of modern slavery in our business operations and supply chain for the financial year ending 31 January 2020 (**FY2019**). The purpose of this statement is to outline our approach to ensuring Wests has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

2. OUR BUSINESS

Wests is a Newcastle not-for-profit membership based organisation that provides entertainment, accommodation and dining, function and fitness facilities across the region. At the core of Wests' operation is a dedication to providing quality venues, food and entertainment for our members and guests. Wests is one of the largest private employers in the area, and an economic driver for the Hunter region. Wests is an integral part of the local community and offers substantial support for schools, sporting teams and charities.

3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

- 3.1. Wests is a public company limited by guarantee, incorporated and domiciled in Australia under the *Corporations Act 2001* (Cth) (**Corporations Act**). Wests' business operations include registered clubs, hospitality, gymnasiums, corporate and administration, and property assets across the Hunter region.
- 3.2. Wests is a member of ClubsNSW, the peak representational body for the NSW club industry, whose purpose is to lead a sustainable industry, seek to strengthen conditions for those working within the industry and to support the local community we serve. Wests is committed to working with ClubsNSW to ensure ethical commitments to fight modern slavery are being adhered to.
- 3.3. Wests have two controlled entities, being:
 - (a) The Executive Inn Pty Limited ABN 82 080 880 691 - a proprietary limited company incorporated and domiciled in Australia under the Corporations Act. Its business operations include hotel accommodation in the Hunter region, and ancillary operations.
 - (b) Knights Rugby League Pty Limited ABN 83 169 964 523 - a proprietary limited company incorporated and domiciled in Australia under the Corporations Act. Its business operations include an Australian professional rugby league club based in Newcastle, and ancillary operations.
- 3.4. As at the date of this statement, Wests has over 1,100 employees and its registered office is 88 Hobart Road, New Lambton, New South Wales.
- 3.5. Wests' supply chains predominantly relate to the sourcing of goods and services for the provision of food and beverage, hospitality, gaming, accommodation,

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gymnasiums, corporate and administration, and professional rugby league. Where possible, Wests' focus is on local, Australian-based suppliers.

4. RISKS OF MODERN SLAVERY PRACTICES

- 4.1. In FY2019, we undertook a risk assessment on Wests' supply chain to identify potential exposure to modern slavery. During the assessment process, we considered risks that may possibly cause, contribute to, or be directly linked to modern slavery practices. We also took into consideration other risk factors such as the sector, industry, types of products and services, geographical locations and business models.
- 4.2. All of Wests' employees are engaged under common law employment contracts, modern awards or registered industrial instruments, which means all employees are paid above the national minimum wage. Wests occasionally engage contracted security, cleaning, maintenance and kitchen staff on an ad hoc basis and in specific venues only. The large majority of these outsourcing companies are local and comply with the Australian employment standards.
- 4.3. The majority of Wests' suppliers are Australian-based. Through everyday business operations there is also an obvious flow-on effect in the Hunter region as we maintain our operations over seven sites. We do our best to purchase locally when we can and we provide hundreds of auxiliary positions in this region. However, we recognise that Wests could be indirectly exposed to the risk of modern slavery and human trafficking through our supply chains due to sector and industry risks and geographical risk.
- 4.4. We identified potential risk 'hotspots' in our business due to certain sectors and industries that may have higher modern slavery risks. This is where a local supplier may source a product, such as food products, uniforms and jerseys, building and construction materials, merchandise and furniture, from overseas sources, which may have a record of having modern slavery practices still in place. We source jerseys from an Ireland-based supplier, which we understand operates an entirely vertically integrated manufacturing operation. We have engaged suppliers based in China for bulk purchases of items such as promotional merchandise, stationary and gym equipment, which has a geographic risk as this country has a higher risk of modern slavery. To date, these bulk purchases have been made on an ad hoc basis.
- 4.5. We will use these potential risk scenarios to prioritise our supplier engagement activities over the next financial year. We will also ensure relevant staff are aware of these risks as part of training.

5. ACTIONS TO ADDRESS MODERN SLAVERY RISKS

5.1. Wests has five defined core values including:

- (a) people and safety;
- (b) community;
- (c) innovation and change;
- (d) business growth; and
- (e) service.

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Through these values, we pride ourselves on professionalism and aim to exceed customer expectations, and as such actively reduce the risk of modern slavery exposure in our operation and supply chains.

- 5.2. In FY2019, we established a Modern Slavery Working Group to identify key risks and requirements, oversee integration into existing compliance functions and increase business awareness of modern slavery risks. The working group assessed potential risks against controls to identify improvements or new mitigating actions. This included an assessment of our potential risk hotspots to help prioritise action.
- 5.3. Wests has an established Audit, Risk and Compliance Committee which is composed of multiple Directors of Wests, the CEO and various executive-level representatives of Wests. This committee meets bi-annually (or as required) to consider any matters relating to risk management, which will include ongoing consultation with the working group to consider and address modern slavery risks.
- 5.4. Wests has a Remuneration and Nominations Committee which is composed of multiple Directors of Wests, the CEO and the Group Chief People Officer. This committee meets bi-annually (or as required) and its duties include:
- (a) reviewing matters relating to remuneration, employment and work, health and safety within Wests;
 - (b) developing a fair and consistent process for setting employee remuneration, using external consultants; and
 - (c) ensuring compliance with relevant industrial legislation.
- 5.5. In August 2019, we implemented a new 'Purchase Plus' procurement system across our operations which provides a transparent and accountable method between our employees and suppliers to order and receive products.
- 5.6. Wests has a number of internal policies to ensure we are conducting business in an ethical and transparent manner, which include:
- (a) Code of Conduct: A set of guiding principles and minimum standards of behaviour that apply to all of our business activities and includes core principles such as safety, compliance and respect for people.
 - (b) Whistleblower Policy: All employees and directors are made aware of their rights to disclose any wrongdoing, and the policy provides protection for employees who disclose any such information. We updated this policy in January 2020.
 - (c) Diversity and Inclusion Policy: A framework to embed and support a diverse workforce and inclusive workplace for all of our employees. It details our commitment to building a workforce that is representative of the communities in which we live, work, and serve. We introduced this policy in FY2019.
 - (d) Supplier Procedure: If a new supplier is introduced to Wests, the person requesting the use of a new supplier must confirm it does not have any conflict of interest, and that person must disclose any existing relationship with that supplier. This information must be recorded on our New Supplier Request Form. Also, gifts

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from suppliers cannot be personally accepted by our employees. We introduced this new procedure and policy in FY2019.

5.7. These established practices and policies demonstrate our commitment to address modern slavery risks, as well as to ensure Wests have fair and ethical practices in place and is compliant with workplace laws.

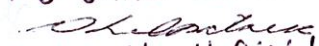
6. ASSESSING THE EFFECTIVENESS OF THE ACTIONS TAKEN

In FY2019, Wests did not identify any instances of modern slavery or human trafficking associated directly with its own operations. No modern slavery or human trafficking concerns were raised with Wests about customers through our feedback channels. Also, in FY2019 there were no complaints through our whistleblower policy. Should any such concerns be identified, we would conduct any required investigations in accordance with regulatory requirements, policy and procedures.

7. CONSULTATION

In FY2019, Wests established a Modern Slavery Working Group which is composed of executive-level representatives across Wests and its controlled entities. The purpose of the working group is to take a collaborative approach by facilitating regular and ongoing consultation between Wests and its controlled entities, and to prepare this statement. The working group will also consult with the Audit, Risk and Compliance Committee on an ongoing basis.

This statement was approved by the Board of Directors of Western Suburbs (N'cle) Leagues Club Ltd ABN 24 000 973 919.

Date: 23 June 2020
Signature: 
Full name: Owen Heathfield Kilpatrick
Title: Director